

EXHIBIT I.5

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE NATIONAL PRESCRIPTION | MDL No. 2804
5 OPIATE LITIGATION |
6 This Document Relates to: | Case No. 17-MD-2804
7 The County of Summit, Ohio, | Hon. Dan A. Polster
8 et al., v. |
9 Purdue Pharma L.P., et al. |
10 Case No. 17-op-45004 |
11 The County of Cuyahoga v. |
12 Purdue Pharma L.P., et al. |
13 Case No. 18-op-45090 |
14 City of Cleveland, Ohio v. |
15 Purdue Pharma L.P., et al. |
16 Case No. 18-op-45132 |

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18 TUESDAY, JANUARY 15, 2019
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21
22 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
23 CONFIDENTIALITY REVIEW
24 - - -

25 Videotaped deposition of MICHAEL COCHRANE,
26 held at Foley & Lardner LLP, One Biscayne Tower,
27 2 Biscayne Boulevard, Suite 1900, Miami, Florida,
28 commencing at 9:11 a.m., on the above date,
29 before Kelly J. Lawton, Registered Professional
30 Reporter, Licensed Court Reporter, Certified
31 Court Reporter.

32 - - -
33 GOLKOW LITIGATION SERVICES
34 877.370.3377 ph | 917.591.5672 fax
35 deps@golkow.com

1 Q. I want to clarify something right up front.

2 From time to time, do you refer to your --

3 first of all, let me ask you this: What is an

4 electronic order monitoring system?

5 A. It's a system that encompasses multiple

6 facets of data and information.

7 Q. Is the purpose of an electronic order

8 monitoring system to analyze orders received in real

9 time as they're received electronically?

10 A. Yes.

11 Q. And from time to time did you refer to the

12 electronic order monitoring system that Anda put in

13 place as a SOM system?

14 A. Yes.

15 Q. In your view, was the electronic order

16 monitoring system the total sum and substance of

17 Anda's suspicious order monitoring system?

18 MR. NOVAK: Objection.

19 THE WITNESS: No.

20 BY MR. MATTHEWS:

21 Q. Could you describe for the record your view

22 of what Anda's system for detecting suspicious orders

23 was in place during the time that you were there?

24 A. It included collecting customers' information

1 as far as our customer questionnaire is concerned;
2 their licensing; the fact that we were reviewing
3 dispense data; the fact that we were reviewing
4 products; potential doctors that they were even using
5 from a script-filling perspective.

6 Q. Was there any period of time during your
7 employment at Anda as head of DEA compliance that
8 Anda didn't have in place a system for detecting
9 suspicious orders?

10 A. No.

11 MR. NOVAK: Objection.

12 BY MR. MATTHEWS:

13 Q. What, if any, time while you were employed as
14 DEA compliance head at Anda did Anda not have a
15 system in place for detecting suspicious orders?

16 MR. NOVAK: Objection.

17 THE WITNESS: No.

18 BY MR. MATTHEWS:

19 Q. By that, you mean none?

20 A. Yeah, none.

21 Q. Okay. So one purpose -- when you -- I'll
22 withdraw that.

23 At some point in time, Anda implemented an
24 electronic order monitoring system; is that correct?